

APPENDIX H: NAVY ANALYSIS OF ALTERNATIVES TO SEALION ROCK

Navy Analysis of Alternatives to Sealion Rock



DEPARTMENT OF THE NAVY

COMMANDER MEDIUM ATTACK
TACTICAL ELECTRONIC WARFARE WING
U.S. PACIFIC FLEET
NAVAL AIR STATION, WHIDBEY ISLAND
OAK HARBOR, WASHINGTON 98278-6000

IN REPLY REFER TO:
5800
Ser 016/0510
14 February 1

From: Commander, Medium Attack Tactical Electronic Warfare Wing,
U.S. Pacific Fleet
To: Commander in Chief, U.S. Pacific Fleet
Via: Commander, Naval Air Force, U.S. Pacific Fleet
Subj: SEA LION ROCK

Ref: (a) P.L. 91-504. 84 STAT 1104
(b) 16 U.S.C. 1132
(c) COMMATVAQWINGPAC ltr ser 016/3778 of 24 Dec 1990
(d) P.L. 100-627, 102 STAT 3217
(e) 16 U.S.C. 1401
(f) 16 U.S.C. 1362
(g) 16 U.S.C. 1372
(h) 16 U.S.C. 1531 et. seq.
(i) 16 U.S.C. 1536 (2)
(j) 16 U.S.C. 701 et. seq.

Encl: (1) Alternatives to Sea Lion Rock (R-6707)
(2) 1986-1990 Scheduling of Sea Lion Rock
(3) COMNAVAIRPAC ltr 5800 ser 011/7040 of 31 Aug 1989
(4) NOAA ltr (Tippie ltr) dtd 8 April 1990
(5) Draft Marine Mammal ltr (Twiss ltr) undated
(6) USFWS ltr (Martin ltr) dtd 9 April 1990

1. In the last several months, it has become increasingly apparent that the Navy's use of Sea Lion Rock will be challenged by both other federal agencies and environmentalists. As the only sea-based bombing target in the Pacific Northwest, Sea Lion Rock is considered an important training option for current and future Navy requirements.

2. SEA LION ROCK. Sea Lion Rock is an exposed reef of rock approximately 80 feet long and 30 feet wide and is located slightly more than three miles off the coast of Washington. Awash at high tide, Sea Lion Rock has no soil or vegetation and is not used by sea birds for nesting or egg laying. Despite its name (a misnomer), Sea Lion Rock is only used by sea lions and harbor seals as an occasional haul out site for resting. No sea lions live on the rock. During a period of observation from 1984 to 1985, no sea lions and only sporadically, harbor seals were observed on Sea Lion Rock.

Subj: SEA LION ROCK

18. ALTERNATIVES TO SEA LION ROCK. During discussions over the last two years, USFWS has proposed several possible alternatives to Sea Lion Rock. USFWS readily concedes that this is the Navy's only sea based target in the Northern Pacific. In addition, they acknowledge that there are no other rocks which could be used for the same purpose. Instead, USFWS suggested certain alternatives which we rejected as infeasible for financial, practical, environmental and scheduling reasons. These alternatives included towed targets, floating targets (including moored targets), out-of-area training and simulation (including cockpit simulation). Enclosure (1) was presented to USFWS as our opposition but they have persisted to state that we have not given serious consideration to these alternatives. On the contrary, these suggestions were seriously considered, but do not warrant more detailed and costly study.

19. OTHER ENVIRONMENTAL ISSUES. Continued use of Sea Lion Rock by naval aircraft as a bombing target will depend upon not only the outcome of the current negotiations with USFWS but will be affected and influenced by several other environmental issues. These issues are discussed below.

20. By reference (d), Congress directed the Secretary of Commerce to designate an area off the coast of western Washington as a National Marine Sanctuary. Sea Lion Rock is located within the area now being referred to as the Olympic National Marine Sanctuary. To date, the National Oceanic and Atmosphere Administration (NOAA) has submitted a preliminary draft Management Plan to concerned agencies, including the Navy. The proposed prohibitions would appear to ban the bombing of Sea Lion Rock. Other Navy activities which may or may not be affected by the designation are described in enclosure (3). Currently, the proposed management plan is being reviewed by OP-44EP1 (POC: Mr. Tom Reeling), and Office of the Assistant Secretary of the Navy (I&E) (POC: Cdr Tim Schnoor), and Office of the General Counsel, (POC: Capt R. M. Mollison). It should be noted that in April 1990, by enclosure (4), NOAA expressed concern about Navy's use of Sea Lion Rock.

21. The Marine Mammal Commission established by reference (e) has also recently raised questions concerning the Navy's use of Sea Lion Rock. In an unsigned draft of a letter addressed to Assistant Secretary of the Navy (I&E), Jacqueline P. Schafer,

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REQUIREMENTS

The U.S. Navy has the requirement for a readily accessible target for use with practice and heavy inert ordnance, near or within the confines of a Warning area or Military Operating Area (MOA), so as to accomplish multiple mission training. The primary training to be conducted in this area is as follows:

- War at Sea exercises;
- Heavy ordnance carriage and release; and
- Multiple aircraft tactical maneuvering.

In addition, this target will serve as the primary alternate target for routine weapons delivery training when the Navy's primary instrumented target (NTRF BOARDMAN, OREGON) is not usable. In this regard, historical data for NTRF Boardman indicates that the target is closed on an average of six days per month due to maintenance, upkeep and training, and 3 days per month due to weather conditions such as high winds, fog and snow. Closure of NTRF BOARDMAN due to fog is more frequent during the Summer. Training requirements for aircrews of Naval Air Station, Whidbey Island, require a year round alternative to NTRF BOARDMAN. Delays in bombing training when squadrons are preparing for carrier deployments have a direct adverse impact on military

ENCL (1)

readiness. Due to operating requirements and schedules, carrier based aircrews have even less flexibility in scheduling bombing practice.

CURRENT CAPABILITIES:

Sea Lion Rock is an unmanned target located off the West coast of Washington, approximately 17 NM North of Pacific Beach Washington and 85 NM from Naval Air Station, Whidbey Island. Scheduling of Sea Lion Rock is controlled by the Operations Office, Commander Medium Attack Tactical Electronic Warfare Wing, U.S. Pacific Fleet, with at least two and one half hours advance notice. The rock is located within the confines of R-6707 and within the Olympic MOA, to the East and contiguous with Warning Area W-237A. Sea Lion Rock is the western-most rock offshore in the area. It is approximately 80 feet long by 30 feet wide, and at high tide it is either submerged or awash.

POSSIBLE ALTERNATIVES:

Towed targets: Navy aircraft have used ship towed targets while operating at sea in the vicinity of surface combatants. These targets are pontoon mounted, rigid structures, approximately 15 feet long, which are towed 1000 to 1500 feet behind a host ship. Utilization of a towed target in the outer coast of the Pacific Northwest would require a minimum of 30 days advance

notice to task a dedicated surface vessel. Storing the target on the outer coast would reduce the time required, but a considerable time would still be required, several days to over a week, to arrange for a towing craft from the Puget Sound area, for it to transit to the area, and for it to prepare and tow the target. Scheduling would depend on the availability and operating requirements of surface vessels. The lack of predictability and flexibility in scheduling a towed target would preclude the use of this alternative as a viable training target and as a weather backup for NTRF BOARDMAN. This need for a readily available alternative to Boardman and a sea based target is a year round requirement. The lack of predictability and reliability in utilizing a towed target precludes its use, even on a seasonal basis. Although conceivably carriers could carry and tow targets, carrier operating requirements, including the launching and recovery of aircraft, preclude this as a reliable training option.

Floating targets: This alternative would require the preparation and mooring of a target barge in the Pacific Ocean off the coast of Washington, within the confines of W-237A. Deep water mooring of a barge would require that it be able to withstand the heavy seas and storms of this area. It would not be feasible to moor such a barge year round as the hazard to navigation and the danger to the environment should the barge break free of its moorage would be too great. Instead a tug would be required to tow the barge to its target location. At least two

to three days would be required for the target barge to be towed and moored. The initial and recurring costs would be substantial. At a minimum the estimated costs would entail the following:

-Preparation of a target barge	\$ 50,000.00
-Installation of Deep Water Mooring	\$250,000.00
-Environmental documentation	\$ 50,000.00
-Towing (\$8000 to \$10,000 per day)	\$ 60,000.00(recur -ring)
 -TOTAL COST OF A SINGLE MOORAGE	 \$410,000.00

A moored target is not considered feasible. Besides the considerable cost, the very real possibility that the barge could break free of its mooring presents an unacceptable risk to navigation and the environment. A moored target vessel used off the Pacific Missile Test Center, Point Mugu, California, broke free of its mooring, became a hazard to navigation, and cost in excess of 3 million dollars to remove from San Miguel Island where it had washed ashore.

A buoy-sized target has been suggested, but is also not an acceptable alternative. While the costs would be substantially less, the size would render it an unsuitable target. Target location, bombing and bomb scoring would be unworkable. In addition, a successful bomb strike could either sink the target, or break it free of its mooring, presenting a hazard to

navigation. Finally, buoys and similar moored and marked objects in navigable waters would be used as a reference point by fishermen.

Other target rocks: Based on the Navy's review of the area and discussion with U.S. Fish and Wildlife Service representatives, no other rocks so ideally suited for a target have been located off the Western Coast of Washington. The location of the rock relative to Naval Air Station, Whidbey Island, its distance from the coast and populated areas, and the fact that Sea Lion Rock is not used by marine mammals or sea birds for breeding and nesting, are factors in combination not characteristic of any other rock in the area.

Simulation: A Weapons System Training flight simulator is available for A-6 aircrew training at Naval Air Station, Whidbey Island. Although this simulator is used for basic weapons delivery procedures, it cannot be used for multi-plane, tactical maneuvering or coordinated target timing. Use of computer generated technology will not simulate the actual conditions of bomb carriage and release, such as 'G's' and aircraft handling associated with heavy ordnance. The current system is too old to be updated and no new A-6 trainer is planned as the plane itself will be phased out over the next 15 years. In addition, flight simulation is only one portion of the training required for aircrew bombing proficiency. To adequately train an aircrew, it is

necessary to actually drop bombs from the airplane. Even target simulation in an A-6, if the technology existed in the A-6 which it does not, would fail to train the crew for the real life scenario of dropping bombs on target. Moreover, cockpit bombing simulation in an A-6 would still require a real target, and would not obviate the need for Sea Lion Rock.

Out of area training and targets: The fundamental need is for a target to be used by Whidbey Island based aircrews. To integrate over the sea bombing training with all other phases of aircrew training, a target within the range of the A-6 must be available. When Whidbey based aircrews are deployed to other areas such as Southern California, they do use the targets available in that operating area. Such training is limited by the availability of these targets and higher priority Battle Group training commitments that can only be accomplished in these areas.

CONCLUSION

The Navy must have access to Sea Lion Rock on a continuing basis for over the sea bombing practice.



DEPARTMENT OF THE NAVY

THE ASSISTANT SECRETARY OF THE NAVY
(INSTALLATIONS AND ENVIRONMENT)
WASHINGTON, D.C. 20360-5000

29 APR 1992

*faxed copy to
Rob Shallenberger,
Division of
Refuges/FWS
5/4/92*

Mr. Richard Smith
Deputy Director
U.S. Fish and Wildlife Service
Department of Interior
Washington, D.C. 20240

Dear Mr. Smith:

We were pleased to meet with you on 3 March 1992 to discuss the Department of the Navy's (DoN) use of Sea Lion Rock within Copalis National Wildlife Refuge as an inert bombing target. As explained below, the DoN believes that the public interest is best served by allowing continued use of Sea Lion Rock for training vital to the national defense pursuant to the existing letter of permission from the Secretary of the Interior. The careful studies already conducted do not reveal any significant impact. There is simply no site specific evidence that the DoN activities have materially impaired the purposes of the refuge. Although we expect that both the DoN and the U.S. Fish and Wildlife Service will continue to monitor the situation carefully, we do not believe any change to the existing letter of permission is required at this time.

A DoN review conducted as a result of our meeting concludes that Sea Lion Rock remains an essential training asset because it is the only inert bombing target off the Northwest Coast available when conditions at land-based targets are unfavorable or when a sea-based target is required. To aircrews, the closer the training approaches the mission requirements under actual conditions, the higher the quality of training. Training requirements for A-6 aircrews include practice weapons deliveries against sea based targets, consisting of coordinated strikes against ships or task groups. Using Sea Lion Rock as a target, aircraft operating in coordination can attack an actual sea based fixed object. Thus, aircrews are able to experience approaching a sea based target and releasing ordnance under ocean wind/weather conditions and water/land contrast.

Sea Lion Rock also serves as a land based backup target when Naval Weapons System Training Facility (NWSTF) Boardman is not available, providing a readily accessible target within range of aircraft taking off from Naval Air Station (NAS) Whidbey Island. NWSTF Boardman is unavailable an average of nine days per month due to weather or other conditions. Sea Lion Rock, as an alternate target, allows aircrews to complete training of a particular evolution within a limited period of time. In times of national crisis when the tempo of deployment training increases and adhering to schedules becomes even more critical, a backup target becomes invaluable.

The unique location of Sea Lion Rock along the Northwest Coast permits ideal bombing practice involving evasion tactics training because of its proximity to Warning Area W-237A and the Olympic Military Operating Area (MOA). Aircraft can release their inert weapons and, before returning to NAS Whidbey Island, engage in defensive air combat maneuvering critical to survivability. The airspace required for such training is not available at NWSF Boardman, but is available at Sea Lion Rock within the Olympic MOA. Sea Lion Rock is also ideally situated for aircraft carriers conducting training in the waters off the Northwest Coast. NWSF Boardman usually is not within range of the embarked aircraft, however, Sea Lion Rock is available within the cyclic flight operations schedule of the aircraft carrier with no requirement for inflight refueling or Federal Aviation Administration interface. The importance of Sea Lion Rock is further enhanced by the homeporting of the USS NIMITZ in the Pacific Northwest and the likelihood that fleet operations will continue to require a sea based target.

Efforts have been made to investigate alternative bombing options, including the use of towed targets, floating targets (barges and buoys), smoke floats, small reflector targets, other target rocks, simulation, and out of area training and targets. These alternatives are not feasible because of logistics and/or cost constraints. As budget reductions become greater, the cost of maintaining and operating alternate portable targets becomes very important.

Sea Lion Rock is part of a diminishing supply of assets available for DoN training. If Sea Lion Rock is given up outright or its use so limited that it is essentially forfeited, the training opportunities it provides will be forever lost.

The DoN shares your concerns over protection of the refuge. We believe, however, that the results of the 1984-85 study conducted by the Washington Department of Game for DoN supports our conclusion that A-6 aircraft operations, conducted according to the Operations Plan, do not significantly impact the resources associated with Sea Lion Rock. The DoN will continue to ensure compliance with the Operations Plan and is exploring additional measures to ensure compliance. I have requested that personnel at NAS Whidbey Island meet with representatives of your regional office at their request to discuss these additional measures. The DoN point of contact is Commander J.J. Stonier at 206/257-2470. We look forward to working together to solve our mutual concerns.

Sincerely,



JACQUELINE E. SCHAFER